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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF LINDSAY COOPER
24 IN SUPPORT OF PLAINTIFF WAYMO
25 LLC'S ADMINISTRATIVE MOTION TO
26 FILE UNDER SEAL PORTIONS OF ITS
27 REPLY IN SUPPORT OF ITS MOTION
28 TO COMPEL PRODUCTION OF
WITHHELD DOCUMENTS AND
EXHIBITS THERETO**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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45 CASE No. 3:17-cv-00939-WHA

46 COOPER DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of Its Reply in Support of its Motion to Compel Production of Withheld Documents and Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Reply in Support of its Motion to Compel Production of Withheld Documents	Highlighted Portions	Defendants ¹ (blue highlighting)
Exhibits 9-11 of the Declaration of Patrick Schmidt ("Schmidt Decl.")	Entire Documents	Defendants

3. Waymo seeks to seal information designated by Defendants as confidential or attorneys'-eyes-only information. Waymo expects Defendants to file one or more declarations to support the sealing of this information.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on May 16, 2017.

By /s/ Lindsay Cooper

Lindsay Cooper
Attorneys for WAYMO LLC

¹ Defendants refers to Uber Technologies, Inc. (“Uber”), Ottomotto LLC (“Ottomotto”), and Otto Trucking LLC (“Otto Trucking”) collectively.

1 **SIGNATURE ATTESTATION**

2 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
3 filing of this document has been obtained from Lindsay Cooper.

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5 */s/ Charles K. Verhoeven*
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